

Exhibit A

<u>Disputed Request</u>	<u>Google's Response</u>	<u>Plaintiffs' Proposed Compromise</u>	<u>Google's Proposed Compromise</u>	<u>Order</u>
<p>RFP No. 3: All raw data that YOU received from the SUBJECT WEBSITES during the CLASS PERIOD via GOOGLE ANALYTICS. If this data is available in csv or similar structured data format, please produce it in that format.</p>	<p>Google incorporates its general responses and objections as set forth above. Google further objects to this Request on the grounds that: (i) it is vague and ambiguous as to the undefined terms “raw data”, “csv”, and “structured data”; (ii) it is overbroad and disproportionate to the needs of the Action and thus any corresponding search and production would be unduly burdensome; (iii) it seeks documents that are not relevant to any claims or defenses in the Action and thus seeks documents outside the scope of permissible discovery; (iv) it is unduly burdensome, overbroad, and disproportional to the needs of the case because it seeks documents and information relating to data that is not at issue in this case; (v) it is overbroad and unduly burdensome to the extent it seeks “all” documents within an overbroad category of documents related to multiple websites, without regard to the relevance of the data; and (vi) it is overbroad and unduly burdensome as to time, including to the extent it seeks</p>	<p>As detailed in the Joint Statement Regarding Discovery Dispute, Plaintiffs have compromised by limiting RFP No. 3 in various ways, including by limiting (a) the specific tax preparation companies to be included in the search; (b) the Tax Preparers’ specific digital properties to be searched; (c) the time periods of the Class Event Data to be searched; and (d) the types of data to be included as “Class Event Data.”</p>	<p>Should the Court conclude that any production is necessary, Google is willing to produce an anonymized sample of the Google Analytics data associated with the Tax Websites’ relevant Google Analytics properties.</p>	

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	<p>information outside the applicable statutes of limitation. Google also objects to this Request to the extent it seeks documents protected by the attorney-client privilege, work product privilege, and/or other applicable privileges.</p> <p>Subject to the above objections, Google responds that it will not produce any documents in response to this Request as currently presented but will consider a properly tailored request after the parties have met and conferred to discuss this Request.</p>			